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CHRIS PRINCIPE

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

CHRIS PRINCIPE,

Plaintiff,

v.

TIMOTHY GLEN CURRY A/K/A
TIMOTHY TAYSHUN,

Defendant.

) Case No. 8:17-cv-00608 JLS (KESx)

) **DECLARATION OF CHRIS
PRINCIPE IN SUPPORT MOTION
FOR PRELIMINARY INJUNCTION
ORDER AGAINST HARASSMENT**

) DATE: December 1, 2017
) TIME: 2:30 p.m.
) CTRM: 10A

) Hon. Josephine L. Staton
)
)
)

1 I, Chris Principe, declare as follow:

2 1. I am the Plaintiff in this action. I make this declaration of my personal
3 knowledge and, if called as a witness, could testify competently to each of the following
4 facts.

5 2. I am a consultant in transaction banking, finance and technology. My career
6 as a consultant also focuses on global trade using cryptocurrency and blockchain.
7 Cryptocurrencies, such as BitCoin, are digital currencies in which encryption techniques
8 are used to regulate the generation of units of currency and verify the transfer of funds,
9 operating independently of a central bank. Blockchain is a digital ledger in which
10 transactions made in cryptocurrency are recorded chronologically and publicly

11 3. In furtherance of my consulting business, I have given numerous speeches
12 and presentations, as well as trainings and workshops, throughout the world. I have
13 written over thirty published articles in the transaction banking, finance and technology
14 arena. I am the official Trade Finance Trainer for the certificate program of Florida
15 International University and Florida International Banking Association (FIBA) since
16 2012.

17 4. I was Chairman of the Banker's Association for Finance and Trade
18 (BAFTA) and the International Financial Services Association (IFSA) National Trade
19 Services Product Management Committee from January 2009 to December 2013. I was
20 the first non-banker voted as the Chairman of this committee. I was also the Founding
21 Chairman of the IFSA Financial Supply Chain Committee in February 2008. Further, I
22 am an owner and publisher of Financial IT, an online and print resource for Financial
23 Technology market analysis.

24 5. I have enjoyed a good reputation both generally and in my occupation. My
25 clients have highly recommended me to others and have referred to me as, among other
26 things, "a real expert in trade finance and supply chain," "one of the most visionary Trade
27 Finance and Financial Supply Chain executives in the space," and "a diligent and highly
28 experienced worker."

1 6. My understanding is that Defendant is the President and co-founder of the
2 now defunct ezCoinAccess, which seeks to make BitCoin accessible and available to
3 everyone throughout the world. Defendant claims to operate BitCoin kiosks, which act
4 like cryptocurrency ATMs, in furtherance of his investment in the BitCoin
5 cryptocurrency. Defendant supports BitCoin by, among other things, attacking
6 competitors of BitCoin, like OneCoin, over the Internet and on social media. Defendant
7 uses the Twitter handle @ezCoinAccess to make such attacks. Defendant also frequently
8 comments on the BehindMLM blog posts accessible at behindmlm.com, where he also
9 makes these attacks.

10 7. BehindMLM is a blog or review site on the Internet dedicated to being a
11 resource to people curious about the multi-level marketing (i.e. MLM) industry and the
12 companies that exist within it.

13 8. In February 2016, Financial IT featured a photograph of Ruja Ignatova on its
14 cover and in an article about OneCoin, a cryptocurrency promoted by Ms. Ignatova and
15 her company, Onecoin Ltd., and which is a competitor to BitCoin. Neither Ms. Ignatova
16 nor OneCoin Ltd. paid me or Financial IT for that cover and article. I also gave a speech
17 in June 2016 about the uses and benefits of cryptocurrencies in global trade at an event
18 hosted by OneCoin Ltd. in London, England. I was not paid for that speech by Ms.
19 Ignatova or OneCoin Ltd. In fact, neither Ms. Ignatova nor OneCoin Ltd. has ever paid
20 me or Financial IT for any publication, speech, or support, nor am I an employee of
21 OneCoin Ltd. or a paid sponsor or representative of OneCoin Ltd.

22 9. Defendant consistently refers to OneCoin as a Ponzi scheme and a criminal
23 enterprise in his Tweets and posts on the Internet. Defendant has done so daily or near-
24 daily and at a high volume. In many of Defendant's Tweets and posts, Defendant has
25 falsely claimed, and without any evidence, that I have engaged in criminal activity by
26 being paid by, and working to support, OneCoin Ltd.

27 10. Defendant has sought to destroy my consulting business and publishing
28 business by sending Tweets to my Twitter handle @cmpleo and Financial IT's Twitter

1 handle @financialit_net to ensure that followers of my and Financial IT's Twitter feeds
2 would see Defendant's false and defamatory Tweets.

3 11. Defendant has also used a series of hashtags in his Tweets to further more
4 broadly disseminate his false statements. For instance, Defendant uses hashtags such as
5 "#onecoin" and "#ponzi" to tie Defendant's defamatory Tweets to other Tweets using the
6 same hashtags.

7 12. Many of Defendant's harassing Tweets concerning me are posted within
8 days of each other or even on the same day, sometimes in rapid succession. Some
9 Examples include:

- 10 • "@cmpleo . . . @financialit_net . . . Chris Principe pimps #ponzi#Onecoin.";
- 11 • "@cmpleo . . . @financialit_net Chris Principe is a PAID SHILL for
12 #Onecoin #ponzischeme.";
- 13 • "@cmpleo . . . @financialit_net . . . WHY IS Chris Principe touring/shilling
14 known #ponzischeme #Onecoin.";
- 15 • "@cmpleo . . . @financialit_net Chris Principe on #Onecoin #ponzi payroll
16 #PaidShill.";
- 17 • ". . . @cmpleo @financilit_net . . . The Publisher, Chris Principe @cmpleo
18 is on #Onecoin #ponzi payroll!";
- 19 • "@cmpleo . . . WHY IS Chris Principe PROMOTING A KNOWN #PONZI
20 #Onecoin."; and
- 21 • ". . . @cmpleo . . . WHY Is Chris Principe promoting a KNOWN and
22 INFAMOUS #ponzischeme?"

23 13. At least one of my business deals has been destroyed as a result of this
24 activity. In June 2016, I first met with members of the management team of Skyway
25 Capital ("Skyway") who were interested in the combination of a future mode of
26 transportation with financing through crowd funding. In September 2016, Skyway asked
27 me if I would be interviewed for Belarus television about my opinions of Skyway and
28 what I thought Skyway's impact would be on the future of transportation. I was not paid

1 for this interview. Skyway and I entered into a representative's agreement in September
2 2016. Pursuant to this agreement, I would provide Skyway with access to my network of
3 contacts in banking, government and industry.

4 14. Due to Skyway's relationship with me, Skyway was also identified as a
5 Ponzi scheme by BehindMLM and Defendant. Skyway did not want to be associated with
6 me because of the adverse effect it would have on Skyway's business, reputation, and
7 ability to find investors. Skyway canceled its agreement with me in 2017 because
8 Skyway found statements by Defendant on the Internet falsely linking me directly as a
9 promoter of a Ponzi scheme and Skyway therefore did not want to be associated with me.

10 15. The financial industry in which I operate is risk adverse, and I have lost this
11 and other business opportunities as a result of Defendant's harassing conduct. As a result,
12 in addition to the inherently harassing nature of Defendant's activity, my ability to earn a
13 living is being damaged by the harassment. This impairment to my ability to earn a living
14 is further compounding my emotional distress.

15 16. After this action commenced, Defendant sent me a request to connect with
16 him on the social networking site LinkedIn. The request was accompanied by a message:
17 "I'm going to help put you in jail . . . In my opinion, you are a STUPID
18 MOTHERF****R for f***ing with me, you piece of sh**. [W]ait for it!"¹ I have
19 declined or ignored these requests. However, whenever I decline them, Defendant sends
20 another request with another harassing message. Similarly, when I ignore them, they
21 expire after thirty days, at which point, Defendant sends a new one. A copy of one such
22 message is attached as Exhibit 1.

23 17. In addition to sending messages on LinkedIn, Defendant has been tagging
24 me in a barrage of harassing Tweets. For instance, on September 8, 2017, Defendant sent
25 me Tweets at 4:05 a.m., 4:07 a.m., 4:10 a.m., and 5:29 a.m., to name a few. On
26 September 18, 2017, Defendant sent Tweets at least at 2:27 a.m., 9:02 a.m., 9:12 a.m.,
27 9:16 a.m., 9:22 a.m., and 9:43 a.m. On September 19, 2017, Defendant again unleashed a

28 ¹ In this declaration, certain phrases of Defendant are redacted or partially redacted due to their offensive nature.

1 series of Tweets, and on September 20, 2017, Defendant Tweeted at me at least at 7:09
 2 p.m., 7:29 p.m., and 7:35 p.m. The language in these Tweets is highly offensive. A
 3 compilation of offensive Tweets and social media postings, most of which are date and
 4 time stamped, are attached as Exhibit 2. Some of the Tweets I have received include the
 5 following:

- 6 • “U attack ME for EXPOSING UR ASS??? I won't stop EXPOSING YOUR
 7 ASS until UR in JAIL”;
- 8 • “Tell your attorney, Howard Kroll, I'm calling you an accomplice to PONZI,
 9 ON THE RECORD!”;
- 10 • “FEDS! Follow ALL DRAMA by searching ‘Chris Principe’ on this site
 11 [website]”;
- 12 • “HEY FEDS!!! FOLLOW THE WIRE FRAUD AND MONEY
 13 LAUNDERING TRAIL!”;
- 14 • “U guys must already have SEVERAL of these intl economic criminal in
 15 your Watch list.”;
- 16 • “FOLLOW THIS THREAD TO FIND ECONOMIC CRIME. PLEASE
 17 TAKE ACTION.”;
- 18 • “That's correct I have dates n which Principe met w/ OTHER OC scammers
 19 to fund his case”;
- 20 • “Chris Principe appears 2B a serial scam opportunist who'll enable Money
 21 Laundering opportunities to infamous criminals”;
- 22 • “You're going down too, scammer. Enjoy while you can.”;
- 23 • “I WILL B TESTIFYING AGAINST U N FEDERAL COURT WHEREIN
 24 U R THE DEFENDANT & THE SEC IS THE PLAINTIFF U A**HOLE!
 25 WASTE MY TIME!? F-YOU!”;
- 26 • “Better seek a new career, because this industry DOESN'T WANT YOU
 27 SCAMMERS!”; and
- 28 • “Scammers get kicked out of ‘blockchain events.’ Sorry Chris Principe, you

1 scamming pieced shit! Someone figured you out!”

2 18. Defendant has been copying various organizations, ranging from
3 professional organizations to the FBI and SEC with his Tweets.

4 19. These are but examples of the near-daily barrage of messages, which are
5 taking up a significant amount of my time to sort through to reach legitimate messages.

6 20. I have been using Twitter since 2009 and therefore enjoy a wide following.

7 21. As a result, Defendant’s harassing messages are being disseminated to a
8 broad audience. Defendant has also begun posting images of me and bragging about how
9 I have been un-invited from events due to Defendant’s comments and postings. In
10 addition to the emotional distress caused by the original postings and the loss of these
11 engagements, I am experiencing additional emotional distress as a result of Defendant’s
12 subsequent posting bragging about these results. My specific symptoms of emotional
13 distress are discussed further below.

14 22. Defendant has begun using the mobile phone messenger application
15 WhatsApp to broaden his efforts to bombard me with harassing messages on my mobile
16 phone. As an example, Defendant has added me to a group chat message titled “OneCoin
17 Victim Support.” Defendant is barraging me with messages at all hours, including the
18 early morning and the middle of the night and is encouraging the 160 other people he has
19 added to the group chat to do so as well. These messages contain the same type of
20 untruthful and vile allegations and comments contain in the Twitter posts. Transcriptions
21 of some of these messages are attached as Exhibit 3.

22 23. This conduct has caused me extreme emotional distress. Specifically, I am
23 experiencing anxiety, depression, and agitation from these activities. I have been losing
24 sleep, both because of the timing of the messages and because of the impact they are
25 having on both my emotional state and my professional career. I have also experienced
26 shortness of breath. I have not yet sought professional help to cope with Defendant’s
27 conduct, but I do not feel that doing so will be productive if his conduct remains ongoing.

28 24. When Defendant brags about the impact he is having, it only serves to

1 redouble my anxiety. His pleasure in my pain troubles me deeply and makes me believe
2 he will not stop his conduct unless he is forced to do so. I also worry about my ability to
3 acquire gainful employment in the future, particularly given that Defendant's conduct has
4 impacted my current employment opportunities.

5 25. Defendant's efforts to cause third parties to "pile on" only serves to increase
6 my anxiety and distress. The longer Defendant continues with this activity, there is a
7 better chance that it will gain continued momentum beyond Defendant, a concern which
8 causes me immense stress.

9 26. I am not a public figure in that I do not hold any public office.
10

11 I declare under penalty of perjury under the laws of the United States of America
12 that the foregoing is true and correct and that this declaration was executed on October
13 20, 2017 in Toronto, Canada.
14



CHRIS PRINCIPE